

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

COUNCIL TAX REDUCTION SCHEME

SECTION 1 - INTRODUCTION

This EqIAA discusses the proposals relating to the council tax reduction scheme.

Background

In April 2013, council tax benefit was replaced by a local council tax reduction scheme. People who are entitled to a council tax reduction pay less council tax.

The government has said people of state pension credit age will continue to be assessed under a national scheme and will not be affected by any changes.

Proposals from April 2018

Consultees were provided with 4 options, these being:-

- Option 1: Adopt additional new rules for the scheme
- Option 2: Do not change the scheme
- Option 3: I do not have an opinion on the changes
- Option 4: My alternative proposal

SECTION 2 - CONSULTATION CONDUCTED

The Council issued a public consultation with regard to the proposed changes to the Council Tax Reduction Scheme.

The consultation commenced on 17 July to 8 October 2017.

- Consultation methods included:-
 - Online consultation via the council's website
 - Paper based consultation.
 - Voluntary/community organisations
 - Parish Councils
 - Letters to all existing LCTR recipients

Consultation Results

The consultation included questions in relation to respondents:-

- Gender
- Age
- Ethnic Origin
- Disability

In order that results and feedback can be disaggregated in respect of the questions raised.

SECTION 3 - RESEARCH CONDUCTED

Equality Impact Assessment and Analysis (EqIAA) is the process of finding out whether the council's 'Functions' (i.e. policies, procedures and practices) have a **differential impact** on different groups of people. It is about analysing actions/activities in relation to equality.

In the context of this EqIAA, this means finding out whether any groups of people would experience a differential impact should the Council change the LCTR scheme.

Data has been gathered in respect of working age recipients currently in receipt of LCTR. The following tables show this data, detailing the numbers and percentages of working age recipients currently in receipt of LCTR and who would potentially be affected by the Options.

	<i>Male</i>	<i>Female</i>	<i>18</i>	<i>19 to 24</i>	<i>25 to 44</i>	<i>45 to 64</i>	<i>Total size of set</i>
Working Age	804	1680	2	113	1190	1180	2484

	<i>Male</i>	<i>Female</i>	<i>18</i>	<i>19 to 24</i>	<i>25 to 44</i>	<i>45 to 64</i>	<i>Total size of set</i>
Working Age	32%	68%	1%	5%	48%	46%	2484

The data above shows the following:-

- Currently 2484 recipients of LCTR are potentially affected by the proposed changes to the Scheme – this equates to approximately 7% of households in Three Rivers.
- Of the 2484 current recipients of LCTR, 1784 households have been identified as families and lone parents and individuals with additional needs due to disabilities. This equates to 71% of the current working age recipients.
- More Females would be affected by the proposed changes to the Scheme than Males – 68% are Female.
- 25% of recipients affected are currently identified as Disabled. Of this number, 8% fall into at least one of the three 'vulnerable groups' identified above.
- Less than 1% of current recipients are aged 18.
- Less than 5% of the 2484 current recipients of LCTR are aged 19 – 24
- Forty eight percent of the 2484 current recipients of LCTR are aged 25 to 44 years.
- Of the 2484 current recipients of LCTR 46% are aged over 45 years

The following data provides information relating to the population of Three Rivers in order that comparisons can be made in relation to 'protected characteristic' groups.

Three Rivers District Council Population Information Census 2011

Ethnicity

Group	Number	Percentage of Population
Asian/Asian British – Bangladeshi	158	0.2%
Asian/Asian British – Indian	5231	6%
Asian/Asian British – Pakistani	605	0.7%
Asian/Asian British – Chinese	590	0.7%
Asian/Asian British – Other	1409	2%
Black/African/Caribbean/Black British – African	864	1%
Black/African/Caribbean/Black British – Caribbean	598	1%
Black/African/Caribbean/Black British – Other	148	0.2%
Mixed/Multiple Ethnic Groups – White & Asian	775	1%
Mixed/Multiple Ethnic Groups – White & Black African	516	0.6%
Mixed/Multiple Ethnic Groups – White & Black Caribbean	181	0.2%
Mixed/Multiple Ethnic Groups – Other	530	0.6%
White – English/Welsh/Scottish/Northern Irish/British	69550	80%
White – Irish	1747	2%
White - Gypsy or Irish Traveller	79	0.1%
White – Other	3918	4%
Other Ethnic Group - Arab	128	0.1%
Any Other ethnic group	290	0.3%

Age

Age Group	Number	Percentage of Population
Age 0 to 4	5433	6%
Age 5 to 7	3190	4%
Age 8 to 9	2059	2%
Age 10 to 14	5673	6%
Age 15	1143	2%
Age 16 to 17	2333	3%
Age 18 to 19	1823	2%
Age 20 to 24	4357	5%
Age 25 to 29	4716	5%
Age 30 to 44	18269	21%
Age 45 to 59	18301	21%
Age 60 to 64	5314	6%
Age 65 to 74	7327	8%
Age 75 to 84	5167	6%
Age 85 to 89	1425	2%
Age 90 and over	787	1%

Disability

Disability/Day-to-day activities limited	Day-to-day activities limited to some extent
Number	8004
Percentage of Population	23%

Gender

Gender	Male	Female
Number	42317	44946
Percentage of Population	49%	51%

SECTION 4 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

The following table provides an indication of impact.

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Women/Girls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The data indicates that if the LCTR scheme was to change, women will be disproportionately affected.
Men/Boys	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The data shows that current recipients of LCTR will be negatively impacted – currently 32% are Male.
Lesbians, gay men & bisexuals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is currently no data nationally or locally regarding the sexual orientation of LCTR recipients. It is worth noting, that current recipients of LCTR will be negatively impacted.
Transgender people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is currently no data nationally or locally regarding the gender identity of LCTR recipients. It is worth noting, that, current recipients of LCTR will be negatively impacted.
White people (including Irish people)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Current recipients of LCTR will be negatively impacted. People from BAME groups may require practical support in relation to awareness of any changes and networks to support them.
Asian or Asian British people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Black or Black British people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
People of mixed heritage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Chinese people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Travellers (gypsy/Roma/Irish heritage)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
People from other ethnic groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Disabled People:					
Physical impairment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Current recipients of LCTR will be negatively impacted. Disabled People may be particularly impacted and require practical support in relation to awareness of the changes and networks to support them.
Sensory impairment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Mental health condition,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Learning disability/difficulty	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Long-standing illness or health condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other health problems or impairments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)
Older People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	People of state pension credit age and those under 18, are not impacted by these proposals.
Children and Young People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Faith Groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is currently no data nationally or locally regarding the religion or belief of LCTR recipients. It is worth noting, however, that, current recipients of LCTR will be negatively impacted.
Pregnancy & Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The data shows that regardless of protected characteristic, current recipients of LCTR will be negatively impacted. The issue of 'Pregnancy and Maternity' should be cross-referenced with the detailed shown under 'Women/Girls' above.
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impact has been identified.

Analysis of Impacts

The following identifies equalities impacts and considers issues affecting ‘protected characteristic’ groups.

Impact Identified	Comment
<p>Disabled People are particularly affected by the current difficult economic climate due to predominately receiving lower incomes experiencing higher costs, having access to fewer support services, and unpredictable health conditions.</p> <p>People with mental health issues and/or Learning Disabilities are likely to need additional support to understand any changes and how to appropriately respond to them, through support workers, carers and families.</p>	<p>Disabled pension-age recipients of LCTR are protected from the change as pension age recipients are assessed under a national scheme.</p> <p>The council would contact every recipient of LCTR affected by any change to inform them of the impact. As the data may not capture all recipients with a disability, contacting them directly would have a significant positive impact by ensuring correct entitlement is granted and disabilities disclosed.</p> <p>Methods of contact would need to be carefully considered in order to ensure appropriate communication for all regardless of impairment type.</p>
<p>Issues for BAME communities may apply, in relation to awareness of the changes and networks to support them. There is evidence to show that people from minority ethnic backgrounds have lower levels of income than other groups</p>	<p>Every recipient of LCTR affected by the change will be contacted to inform them of the impact. As the above data relating to current recipients of LCTR may not capture the ethnicity of all recipients, contacting them directly would have a significant positive impact by identifying where additional support is required.</p>
<p>There are differences in women’s employment and earnings patterns including the continuing national gender pay gap. This, as well as the fact that women head up around 90% of lone parent families can lead to a socio-economic disadvantage and increased reliance on state support. Women also still tend to hold the main responsibility for child care and other caring responsibilities which can limit their ability to seek employment.</p>	<p>The data indicates that if there is a change to the LCTR scheme women will be disproportionately affected – over two-thirds (68%) of current recipients are Female.</p>

The option most supported by consultation respondents was Option 2: entitlements based on bands of income which was supported by 57% of respondents. Option 2 was clearly the most favoured option across all Protected Characteristic groups.

For Females, the impact will be greater than others.

In mitigation of these greater impacts, the council would contact all current working age recipients of LCTR in order to inform them of changes and in order to encourage self-identification (i.e. the council’s records reflect personal circumstances and therefore, the correct amount of entitlement is granted), for example, this could mean disclosing a disability which records may currently not hold. Methods of contact will be carefully considered in order to ensure appropriate communication for all regardless of impairment type.

SECTION 5 - EqIAA OUTCOME

This EqIAA has identified negative impact in relation to the majority of Protected Characteristic groups. This is because entitlements to LCTR would reduce.

This negative impact will be greater for Females as the demographic of the current case load shows more Females than Males i.e. 68% of the current case load are women.

SECTION 6 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

The council will contact all current working age recipients of LCTR in order to inform them of any changes to be adopted and in order to encourage self-identification (i.e. the council's records reflect personal circumstances and therefore, the correct amount of entitlement is granted), for example, this could mean disclosing a disability which records may currently not hold. Methods of contact will be carefully considered in order to ensure appropriate communication for all regardless of impairment type.

APPENDIX 1

Table 12: Equality analysis of survey responses

	Overall	Respondent Type												
		Council tax reduction recipient	Council tax payer	Organisation	Vulnerable person	Working age	Pensionable age	A recipient of council tax reduction (pensioner)	A recipient of council tax reduction (non pensioner)	A council tax payer (pensioner)	A council tax payer (non pensioner)	A family or lone parent with a child under the age of 5 (as at 1st April 2014)	A family or lone parent with a disabled child up to the age of 18	An individual with additional needs due to disabilities
<i>Base</i>	219	76	129	9	52	127	62	26	50	45	86	12	7	36
Which option do you think the council should adopt?														
Option 1: Reduce entitlements by a standard percentage	17%	11%	23%	22%	-	14%	27%	19%	6%	31%	19%	-	-	-
Option 2: Entitlements are based on bands of income	57%	70%	52%	44%	62%	60%	52%	69%	70%	44%	56%	83%	43%	61%
Option 3: Change the scheme's rules and entitlement limits	11%	5%	15%	11%	10%	12%	13%	4%	6%	16%	15%	8%	14%	8%
Don't know	4%	7%	3%	-	10%	4%	5%	4%	8%	7%	1%	-	-	14%
Alternative option, please tell us below	10%	7%	6%	22%	17%	9%	2%	-	10%	2%	8%	8%	43%	14%
When considering its council tax reduction scheme, do you...														
Yes	69%	75%	61%	44%	83%	65%	61%	81%	72%	53%	64%	67%	100%	86%
No	23%	12%	31%	44%	8%	25%	26%	8%	14%	31%	30%	33%	-	-
Don't know	7%	11%	7%	-	8%	8%	11%	12%	10%	13%	6%	-	-	11%
If you think the council should introduce some protection...														
Families and lone parents with children under the age of 5	24%	38%	19%	33%	35%	25%	19%	31%	42%	18%	19%	58%	43%	28%
Families and lone parents with disabled children up to the age of 18	46%	51%	45%	44%	58%	46%	45%	50%	52%	44%	45%	42%	100%	56%
Individuals with additional needs due to disabilities	57%	57%	51%	67%	83%	54%	52%	50%	60%	49%	52%	42%	100%	94%
Other vulnerable groups, please specify below	22%	34%	15%	33%	17%	24%	18%	27%	38%	13%	15%	8%	29%	19%
If the council was to introduce option 2, the income band...														
Householders on benefits	27%	43%	15%	11%	44%	26%	26%	42%	44%	16%	15%	25%	57%	50%
Householders in work	34%	22%	42%	22%	23%	40%	24%	12%	28%	31%	47%	42%	43%	11%
Householders on low income regardless of whether they are working or on benefits	58%	70%	53%	44%	62%	56%	60%	73%	68%	56%	52%	58%	43%	69%
Householders on high income regardless of whether they are working or on benefits	1%	-	2%	-	-	2%	2%	-	-	2%	2%	-	-	-
Don't know	2%	3%	2%	11%	6%	2%	2%	4%	2%	2%	1%	-	-	8%
If the council was to introduce option 3, which of the ch...														
Increase deductions for other non-dependant adults in the household	16%	18%	16%	44%	13%	19%	13%	12%	22%	13%	17%	8%	-	17%
Remove disregards and premiums for families	10%	9%	13%	11%	6%	12%	11%	4%	12%	13%	13%	17%	-	3%
Lower the level of savings cut-off limit	22%	22%	24%	33%	31%	23%	21%	19%	24%	22%	24%	33%	14%	33%
Withdrawing council tax reduction for householders in receipt of jobseekers' allowance (income based) after set periods of time	26%	21%	28%	-	27%	31%	18%	8%	28%	20%	31%	75%	29%	8%
Only householders in receipt of income support should be entitled to council tax reduction	7%	7%	6%	11%	6%	6%	8%	8%	6%	9%	5%	-	14%	6%
Only householders who are in paid work and not in receipt of benefits should be entitled to council tax reduction	22%	13%	29%	22%	12%	24%	23%	12%	14%	29%	29%	25%	29%	3%
Don't know	21%	32%	16%	11%	27%	20%	23%	35%	30%	18%	15%	-	29%	36%
Alternative option, please tell us below	11%	12%	9%	-	12%	9%	8%	15%	10%	7%	9%	-	14%	17%
If the council was to introduce option 3, which of the li...														
A limit to the maximum entitlement to council tax reduction	31%	17%	40%	67%	12%	35%	29%	8%	22%	36%	42%	8%	14%	11%
A limit to the minimum entitlement to council tax reduction	5%	11%	3%	-	15%	4%	5%	12%	10%	2%	3%	17%	29%	19%
Both a maximum and minimum limit to the entitlement to council tax reduction	28%	29%	31%	11%	31%	29%	29%	35%	26%	31%	31%	58%	-	25%
Don't know	21%	30%	11%	11%	31%	17%	19%	35%	28%	13%	9%	17%	43%	31%

	Overall	Gender		Age		Ethnicity		Disability	
		Male	Female	Under 65	Over 65	White British	Non White British	Disabled	Non disabled
<i>Base</i>	219	93	109	147	40	162	19	75	116
Which option do you think the council should adopt?									
Option 1: Reduce entitlements by a standard percentage	17%	15%	17%	14%	23%	17%	11%	15%	16%
Option 2: Entitlements are based on bands of income	57%	57%	60%	58%	63%	59%	63%	52%	65%
Option 3: Change the scheme's rules and entitlement limits	11%	13%	9%	10%	8%	9%	21%	9%	12%
Don't know	4%	2%	5%	5%	3%	4%	-	9%	1%
Alternative option, please tell us below	10%	12%	8%	12%	3%	9%	5%	12%	6%
When considering its council tax reduction scheme, do you...									
Yes	69%	67%	76%	71%	68%	72%	74%	75%	71%
No	23%	26%	18%	21%	28%	21%	21%	15%	24%
Don't know	7%	6%	5%	7%	3%	6%	5%	9%	4%
If you think the council should introduce some protection...									
Families and lone parents with children under the age of 5	24%	23%	28%	26%	23%	24%	32%	23%	27%
Families and lone parents with disabled children up to the age of 18	46%	42%	52%	46%	53%	46%	53%	47%	51%
Individuals with additional needs due to disabilities	57%	51%	66%	59%	57%	61%	42%	69%	54%
Other vulnerable groups, please specify below	22%	20%	23%	24%	20%	23%	32%	28%	18%
If the council was to introduce option 2, the income band...									
Householders on benefits	27%	28%	29%	29%	20%	31%	21%	39%	24%
Householders in work	34%	34%	34%	35%	25%	30%	47%	19%	42%
Householders on low income regardless of whether they are working or on benefits	58%	53%	65%	61%	70%	62%	58%	63%	61%
Householders on high income regardless of whether they are working or on benefits	1%	-	1%	1%	3%	1%	-	-	1%
Don't know	2%	2%	1%	3%	-	2%	-	5%	-
If the council was to introduce option 3, which of the ch...									
Increase deductions for other non-dependant adults in the household	16%	18%	14%	16%	15%	17%	21%	16%	17%
Remove disregards and premiums for families	10%	6%	14%	12%	8%	10%	16%	13%	8%
Lower the level of savings cut-off limit	22%	24%	21%	22%	25%	24%	11%	25%	20%
Withdrawing council tax reduction for householders in receipt of jobseekers' allowance (income based) after set periods of time	26%	22%	32%	30%	18%	25%	37%	16%	34%
Only householders in receipt of income support should be entitled to council tax reduction	7%	6%	9%	5%	20%	7%	16%	7%	8%
Only householders who are in paid work and not in receipt of benefits should be entitled to council tax reduction	22%	26%	17%	22%	23%	18%	42%	15%	26%
Don't know	21%	19%	23%	22%	20%	22%	21%	33%	16%
Alternative option, please tell us below	11%	12%	12%	12%	13%	11%	5%	13%	9%
If the council was to introduce option 3, which of the li...									
A limit to the maximum entitlement to council tax reduction	31%	27%	35%	29%	30%	33%	16%	20%	38%
A limit to the minimum entitlement to council tax reduction	5%	3%	6%	5%	5%	4%	11%	12%	1%
Both a maximum and minimum limit to the entitlement to council tax reduction	28%	35%	24%	31%	30%	26%	47%	32%	28%
Don't know	21%	18%	23%	22%	18%	22%	16%	25%	18%